## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Newport News Division

PATRICIA E. MULLINEX, Individually and as Executor of the Estate of Herbert H. Mullinex, Jr.

Plaintiff,

v. Case No. 4:18-cv-00033-RAJ-DEM

JOHN CRANE, INC.,

Defendant.

## PLAINTIFF'S MOTION FOR LEAVE TO FILE A FOURTH AMENDED COMPLAINT TO CONFORM TO THE PROCEDURAL POSTURE OF THIS CASE

COMES NOW Plaintiff, by counsel, pursuant to Federal Rule of Civil Procedure 15(a)(2) and submits her Motion for Leave to File a Fourth Amended Complaint to Conform to the Procedural Posture of this Case. For the reasons set forth in Plaintiff's Memorandum in Support of Motion for Leave to File a Fourth Amended Complaint to Conform to the Procedural Posture of this Case, filed contemporaneously herewith, Plaintiff respectfully requests that the Court grant her leave to file the proposed Fourth Amended Complaint attached as Ex. 1 to Plaintiff's Memorandum in Support of Motion for Leave to File a Fourth Amended Complaint to Conform to the Procedural Posture of the Case and for such other relief as the Court deems just and proper.

## Respectfully Submitted,

By: /s/ Hugh B. McCormick, III, Esq. Of Counsel

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of June 2022 a true and accurate copy of the foregoing was filed electronically with the United States District Court for the Eastern District of Virginia using the CM/ECF system, which automatically sends all necessary notifications of this filing to the following:

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By: <u>/s/ Hugh B. McCormick, III, Esq.</u>
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